

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KARLINE JEAN,

Plaintiff,

-against-

Civil Case No.
1:23-cv-08192 (JLR)

ROOSEVELT ISLAND OPERATING
CORPORATION; SHELTON HAYNES;
Individually and in his Official Capacity as
President and CEO OF RIOC; GRETCH
ROBINSON, Individually and in her
Official Capacity as General Counsel of
RIOC; and TAJUNA SHARPE, Individually
and in her Official Capacity as Assistant Vice
President for Administration of RIOC.

Defendants.
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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the Affirmation of Howard M. Miller and exhibits attached, the Defendants shall move this Court before the Honorable Jennifer L. Rochon, United States District Judge for the Southern District of New York, 500 Pearl Street, Courtroom 20B, New York, New York 10007, at a date and time to be designated by the Court, for an Order dismissing the Complaint in its entirety pursuant to Federal Rules Civil Procedure, Rule 12(b)(6), on the grounds that the Complaint fails to state a claim upon which relief can be granted, and for such other relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to an agreed upon briefing schedule endorsed by the Court (ECF #20), Plaintiffs shall serve their opposition papers, if any, on or before December 5, 2023. Reply papers, if any, are to be served upon counsel for Plaintiff on or before December 22, 2023.

Dated: Garden City, New York
November 3, 2023

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

By: 

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